

FILED
At Albuquerque NM

JUN 14 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSHUA GREENE and KAYLEB REYOS,

Defendants.

CRIMINAL NO. 16-2729JB

Count 1: 21 U.S.C. § 846: Conspiracy;

Counts 2 and 4: 21 U.S.C. §§ 841 (a)(1)
and (b)(1)(C): Distribution of Heroin;Counts 3, 5, and 7-8: 21 U.S.C. §§
841(a)(1) and (b)(1)(B): Distribution of
100 Grams and More of Heroin; 18
U.S.C. § 2: Aiding and Abetting;Count 6: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(A): Distribution of 50 Grams and
More of Methamphetamine; 18 U.S.C. §
2: Aiding and Abetting;Count 9: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(B): Possession with Intent to
Distribute 100 Grams and More of
Heroin;Count 10: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(C): Possession with Intent to
Distribute Heroin.

INDICTMENT

The Grand Jury charges:

Count 1

Beginning on a date unknown, but not later than February 4, 2016, and continuing to on or about May 17, 2016, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendants, **JOSHUA GREENE** and **KAYLEB REYOS**, unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit

an offense defined in 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), specifically, to distribute one kilogram and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. § 846.

Count 2

On or about February 4, 2016, in Bernalillo County, in the District of New Mexico, the defendant, **JOSHUA GREENE**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

Count 3

On or about February 25, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **JOSHUA GREENE** and **KAYLEB REYOS**, unlawfully, knowingly and intentionally distributed a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 4

On or about March 9, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **JOSHUA GREENE**, unlawfully, knowingly and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

Count 5

On or about March 22, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **JOSHUA GREENE**, unlawfully, knowingly and intentionally distributed a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

Count 6

On or about March 23, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **JOSHUA GREENE** and **KAYLEB REYOS**, unlawfully, knowingly and intentionally distributed a controlled substance, 50 grams and more of methamphetamine.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A), and 18 U.S.C. § 2.

Count 7

On or about April 12, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **JOSHUA GREENE** and **KAYLEB REYOS**, unlawfully, knowingly and intentionally distributed a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 8

On or about May 4, 2016, in Bernalillo County, in the District of New Mexico, the defendants, **JOSHUA GREENE** and **KAYLEB REYOS**, unlawfully, knowingly and intentionally distributed a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 9

On or about May 17, 2016, in Bernalillo County, in the District of New Mexico, the defendant, **JOSHUA GREENE**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

Count 10

On or about May 17, 2016, in Bernalillo County, in the District of New Mexico, the defendant, **KAYLEB REYOS**, unlawfully, knowingly and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATION

Upon conviction of any of the offenses alleged in this Indictment, the defendants, **JOSHUA GREENE** and **KAYLEB REYOS**, shall forfeit to the United States pursuant to 21 U.S.C. § 853 any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the offenses in violation of 21 U.S.C. §§ 841(a)(1), (b)(1) and 846 for which the defendants are convicted, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, and all property traceable to such including but not limited to the following:

1. MONEY JUDGMENT

A sum of money equal to at least \$28,250 in U.S. currency, including any interest accruing to the date of the judgment, representing the amount of money derived from or involved in the offenses, or traceable to property involved in the offenses.

2. PERSONAL PROPERTY

- a. \$20,010 U.S. currency;
- b. \$4,142 U.S. currency; and
- c. \$3,983 U.S. currency.

3. SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

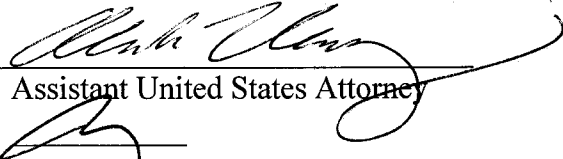
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), 18 U.S.C. § 982(b), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY


Assistant United States Attorney